



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 8**

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**APR 15 2015**

Ref: 8EPR-N

Richard Rymerson, Green River District Manager  
Bureau of Land Management  
Attn: Steve Rigby, Project Manager  
Price BLM Field Office  
125 South 600 West  
Price, Utah 84501

Allen Rowley, Forest Supervisor  
Fishlake National Forest, and  
Brian M. Pentecost, Forest Supervisor  
Manti-La Sal National Forest  
Attn: Thomas W. Lloyd, Minerals, Engineering, and Lands Staff Officer  
Manti-La Sal National Forest  
599 W. Price River Drive  
Price, Utah 84501

Re: Final Supplemental Environmental Impact Statement for the Leasing and Underground Mining of the Greens Hollow Federal Coal Lease Tract; CEQ #20150045

Dear Messrs. Rymerson, Rowley and Pentecost:

The U.S. Environmental Protection Agency Region 8 has reviewed the Final Supplemental Environmental Impact Statement (SEIS) for the proposed leasing and underground mining of the Greens Hollow Federal Coal Lease Tract (Tract) prepared jointly by the U.S. Department of Agriculture Forest Service (USFS) and Bureau of Land Management (BLM), in cooperation with the Office of Surface Mining Reclamation and Enforcement. The Final SEIS analyzes and discloses the potential environmental effects of offering the Tract for lease by BLM and the potential effects of mining and surface use based on a Conceptual Mine Plan and Reasonably Foreseeable Surface Use Scenario. Our review was conducted in accordance with the EPA's responsibilities under section 102 of the National Environmental Policy Act (NEPA), and Section 309 of the Clean Air Act.

**Background**

The project proposes leasing by competitive bid of the Tract that encompasses approximately 6,175 acres for production of federal coal reserves located on the Fishlake and Manti-La Sal National Forests (FLNF and MLNF, respectively) in Sanpete and Sevier Counties, Utah. The coal could be mined through an extension of underground workings in the Southern Utah Fuel Company (SUFCO) mine. According to the Final SEIS, the Tract could also be accessed from other sites, including Muddy Creek Canyon on the north end of the Tract, which would require the development of new portals in adjacent undisturbed areas. The Conceptual Mine Plan scenario assumes that water discharge would continue from existing permitted discharge points. Potential surface disturbances include two ventilation shafts (one with a fan), intake shafts, utility boreholes, a power transmission line, and associated road access.

The Final SEIS analyzes three alternatives, which include the No Action Alternative (Alternative 1), the Proposed Action (Alternative 2) that is intended to represent a maximum impact scenario for subsidence, and the agencies' Preferred Alternative (Alternative 3) that was developed to be more protective of certain critical surface resources, such as perennial streams, from the effects of subsidence within the lease Tract boundary.

Alternative 2 is based on the Conceptual Mine Plan that assumes underground longwall mining techniques will be used, resulting in full extraction of the coal resource over the entire Tract. Under this scenario, about 56.6 million tons of recoverable coal reserves, representing approximately 8.8 years of mining, would be offered for lease. Alternative 2 does not include Stipulation #9 of the special coal lease stipulations from the MLNF Forest Plan that protects certain surface resources such as escarpments, surface structures, and perennial streams from subsidence of the underground coal mine. Excluding Stipulation #9 allows for analyzing the effects of subsidence on all lands in the Tract.

Alternative 3 differs from Alternative 2 in that Stipulation #9 would apply to certain areas identified for special protection, including perennial streams where surface flow could be lost to subsidence-induced cracking of Castlegate Sandstone or where escarpments could fail. For the areas identified for special protection under Stipulation #9, non-subsidence mining (e.g., full-support) would occur. Under this Alternative, about 55.7 million tons of recoverable coal reserves, representing approximately 8.7 years of mining, would be offered for lease.

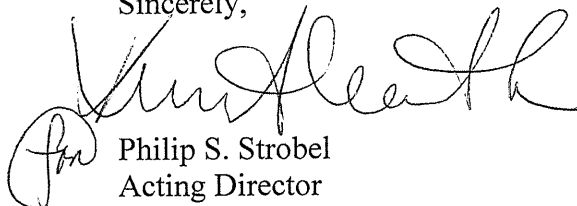
### **Comments and Closing**

Based on the information provided in the Final SEIS, the Preferred Alternative (Alternative 3) is more environmentally protective compared to the Proposed Action, Alternative 2, due to Special Coal Lease Stipulations required under Alternative 3 to avoid and minimize environmental harm. Under this alternative, the project design will avoid some potential impacts to springs and perennial drainages/flows and associated riparian habitat, wetlands and aquatic species. Also, the long-term risk of water loss from perennial streams may be reduced.

We appreciate the efforts of BLM and the USFS to include additional information in the Final SEIS to further support the air quality analysis, specifically the data related to CO<sub>2</sub> emission calculation comparisons. The inclusion of the UDEQ Approval Order for the SUFCO Mine in Appendix F is also a beneficial addition to better inform stakeholders. The Order includes specific information with regard to determining compliance and mitigation for fugitive dust emissions.

We appreciate the opportunity to review the Final SEIS. Thank you for considering our previous input. If you have any questions during this stage of your planning process, please contact Melanie Wasco of my staff at (303) 312-6540. Alternatively, I can be reached at (303) 312-6704.

Sincerely,

A handwritten signature in black ink, appearing to read "Philip S. Strobel", with a stylized "P" and "S".

Philip S. Strobel  
Acting Director  
NEPA Compliance and Review Program  
Office of Ecosystems Protection and Remediation